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13 Adobe Systems Inc.

14 UNITED STATES DISTRICT COURT
15
16 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
17

18 IN RE: HIGH-TECH EMPLOYEE
19 ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

20 THIS DOCUMENT RELATES TO:
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22 ALL ACTIONS
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**DECLARATION OF ADOBE'S IN-
HOUSE COUNSEL KAREN
ROBINSON**

Date Consolidated Amended Compl. Filed:
September 13, 2011

1 I, Karen Robinson, declare as follows:

2 1. I am the Director of Litigation at Adobe Systems Inc. ("Adobe") and have held
3 this position since December 2012. I am responsible for supervising the above-referenced matter,
4 assuming the role held by Ronald Friedman who retired from the company. I submit this
5 declaration pursuant to the Court's April 15, 2013 Case Management Order (Dkt. 402). The
6 following is based on my own personal knowledge, information that I obtained from others with
7 personal knowledge, and a review of records.

8 2. Adobe believes that it has produced all responsive non-privileged compensation-
9 related materials within its possession, custody or control, located after a reasonable search of
10 pertinent records pursuant to agreements between plaintiffs and Adobe.

11 3. Adobe produced all responsive compensation-related data that the parties agreed it
12 would collect and produce from its databases, including without limitation salary and bonus
13 compensation, equity grants, salary ranges, and employee specific information from January 1,
14 2001 to February 2012. Plaintiffs deposed Adobe under Federal Rule of Civil Procedure 30(b)(6)
15 regarding the scope, meaning, and completeness of the data. Adobe also answered written
16 questions by plaintiffs about the data, and Adobe's outside counsel met telephonically with
17 plaintiffs' consulting experts about the scope, meaning, and completeness of the data. I have
18 been informed by Adobe's outside counsel that plaintiffs have no pending requests for
19 compensation-related data from Adobe.

20 4. In addition to compensation-related data, pursuant to an agreement with plaintiffs,
21 Adobe produced responsive compensation-related materials (including policies, manuals, high-
22 level analyses, studies, summaries, salary ranges, market surveys and other compensation-related
23 materials) for the agreed-upon discovery period located through a reasonable and diligent search
24 of pertinent records.

25 5. Adobe also produced responsive compensation-related materials located by
26 running agreed-upon search terms against the files of agreed-upon custodians for the agreed-upon
27 discovery period. I have been informed by Adobe's outside counsel that plaintiffs have no
28 pending concerns about Adobe's production of compensation-related non-data materials.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 25th day of April 2013 in San Jose, California.

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5 By: 
6 Karen Robinson
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